

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**SUPPRESSED**

**FILED**

NOV - 8 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST LOUIS

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. ) No.  
 )  
FRANK D. BROTHERS, )  
 )  
 )  
Defendant. )

**4:18CR00917 RWS/JMB**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges

On or about October 24, 2018, in the County of St. Louis, within the Eastern District of Missouri,

**FRANK D. BROTHERS,**

did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951 in that the defendant did unlawfully take and obtain an article or commodity to wit: US currency, from persons or employees of a Steak and Shake Restaurant against their will by means of actual and threatened force, violence and fear of injury to their persons.

In violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

The Grand Jury further charges that:

On or about October 24, 2018, in the County of St. Louis, within the Eastern District of Missouri,

**FRANK D. BROTHERS,**

did knowingly possess a firearm in furtherance of the crime of violence named in Count One or did use or carry a firearm during and in relation to said crime of violence.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE**

The Grand Jury further charges

On or about November 7, 2018, in the City of St. Louis within the Eastern District of Missouri,

**FRANK D. BROTHERS,**

having been convicted previously of crimes punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly possess a firearm which had previously traveled in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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THOMAS J. MEHAN, #28958MO  
Assistant United States Attorney